

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JAENEAN LIGON, et al. :  
: :  
Plaintiffs, : :  
: : **NOTICE OF MOTION**  
: : **FOR PRELIMINARY**  
: : **INJUNCTION**  
-versus- :  
: :  
CITY OF NEW YORK, et al. : 12 Civ. 2274 (SAS)(HBP)  
: :  
: :  
Defendants. :  
-----X

PLEASE TAKE NOTICE that starting on October 15, 2012, the plaintiffs will move for a preliminary injunction enjoining the defendants from stopping on suspicion of trespass individuals who are exiting, entering, or proximate to private apartment buildings enrolled in the New York City Police Department's "Operation Clean Halls" (also known as the "Trespass Affidavit Program") in the Bronx, New York, in the absence of lawful bases justifying such stops. The plaintiffs further request that the Court order the defendants to take all steps necessary to ensure implementation of the preliminary injunction, including but not limited to monitoring and reviewing all such stops, conducting appropriate training, engaging in sufficient supervision, and reporting to the Court and the parties about compliance with the injunction.

Respectfully submitted,

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Dated: September 24, 2012  
New York, New York